

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Lori Robinson, having been duly sworn, hereby depose and state:

**AGENT BACKGROUND**

1. I am a Special Agent with the Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations (“HSI”), and have been so employed since 2014. I am currently assigned to the Manchester, New Hampshire field office. As part of my regular duties as an agent, I investigate criminal violations relating to a broad range of immigration and customs related statutes, including those relating to child exploitation, child pornography, and human trafficking. I have received training in the area of child pornography and child exploitation, and as part of my duties have observed and reviewed numerous examples of child pornography (as defined in 18 U.S.C. §2256) in various forms of media, including digital/computer media. I have assisted investigations and executed search warrants involving child exploitation and child pornography offenses, including search warrants of electronic devices. I have received training relating to the trafficking in persons, including sex trafficking, and other offenses.

2. I have participated in investigations of human trafficking, human smuggling, alien harboring, border violations, drug and firearm trafficking, and related offenses. Many of these investigations have had national or international connections, and many required me to work closely and share information and intelligence with members of other federal, state, and local law enforcement agencies. I have debriefed defendants, informants, and witnesses who have personal knowledge about human trafficking, including sex trafficking, and other crimes occurring in New Hampshire, nationally, and abroad.

3. From my training and experience, I know that individuals are trafficked for several purposes. Some of these purposes are subjection into involuntary servitude, peonage, debt bondage and slavery. Human trafficking is often accomplished through the use of fraud, force and coercion. I am familiar with the federal and state laws which make it a violation to engage in human trafficking, such as 18 U.S.C. §§ 1581 through 1595 (Peonage, Slavery and Trafficking in Persons), and 18 U.S.C. §§ 2421 through 2428 (Transportation for Illegal Sexual Activity and Related Crimes).

4. I submit this affidavit in support of a criminal complaint charging SHARATH CHANDRA BOLLU and KOTESHWARA RAJU JONNAGODDA with Attempted Sex Trafficking of a Minor, in violation of 18 U.S.C. §§ 1591(a)(1), (b)(1), and 1594(a) and aiding and abetting in violation of 18 U.S.C. § 2.

5. As described below, there is probable cause to believe that, on November 14 and 15, 2024, in and around Manchester, in the District of New Hampshire, and elsewhere, BOLLU and JONNAGODDA, being aided and abetted each by the other, did knowingly in and affecting interstate and foreign commerce, attempt to entice, obtain, solicit, and patronize by any means a person, knowing and in reckless disregard of the fact that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act.

6. This affidavit is based on my personal investigation and investigation by others, including federal and local law enforcement officials whom I know to be reliable and trustworthy. The facts contained herein have been obtained by interviewing witnesses and examining documents obtained in the course of the investigation as well as through other means. This affidavit does not include every fact known to me about this investigation, but rather only those facts sufficient to establish probable cause.

**FACTUAL BACKGROUND**

7. Beginning on or about November 13, 2024, law enforcement posted identical advertisements (the “Advertisements”) on two different regional sites of a website commonly used to advertise prostitution services that contained images of what appeared to depict two young females and the following language:

“Sweet & tight! Ready 2 have some fun!”  
 “In town 4 a limited time only”  
 “Cute & very petite girl that is tight from head to toe! Cum over to play with me!”  
 “Text for donations. Incall only – safe and discrete location.”

8. The Advertisements listed the age as 99 years old<sup>1</sup> and each contained a contact phone number (the “Advertisement Numbers”) that were monitored by law enforcement and operated by an undercover officer (“UC1”).

9. On or about November 14, 2024, the Advertisement Numbers received a text message from a phone number ending in -0801, now known to belong to SHARATH CHANDRA BOLLU (“BOLLU”), in response to one of the Advertisements. Thereafter, a text conversation between UC1 and BOLLU ensued.<sup>2</sup> UC1 stated that they had two minor girls—ages 12 years old and 14 years old—available for various sex acts in exchange for money. The conversation continued over the course of more than 24 hours on both November 14 and November 15, 2024. During the conversation on November 14, 2024, BOLLU agreed to pay \$150 to have sex with the 12-year-old girl:

BOLLU	Hi
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<sup>1</sup> The website utilized by law enforcement requires users to be at least 18 years old to utilize the website’s services.

<sup>2</sup> At different times, the number ending in 0801 was communicating with each of the two Advertisement Numbers.

UC1	hey hun.. u lookin for a good time? i got two beauties
BOLLU	Can I have pics
UC1	i can send one of each.. i have my 12 yo izzy n 14 yo leila both are lots of fun n play well together too
BOLLU	Pic
UC1	u want izzy or leila pic?
BOLLU	Both
UC1	this is izzy [picture sent] <sup>3</sup>
BOLLU	Leila
UC1	leila [picture sent]
BOLLU	Can I have video verification
BOLLU	Can I know price
UC1	dont do videos have had guys turn us into the police n im not lookin for trouble. ur not a cop r u? if u are u have to tell me
BOLLU	No
BOLLU	Can I know price
UC1	rates depend on service.. if u wanna see one girl its hh \$150 or hr is \$200 if 2 girls is more ur thing hr is \$400 n hh is \$200
BOLLU	Can u have already another pic
UC1	i dont mk \$\$ sending pics.. i can send one more. which girl u want?
BOLLU	Leila
UC1	isnt she a real beauty [picture sent]
BOLLU	I sorry izzy
BOLLU	Please
BOLLU	There
UC1	this is izzy but no more pics!! [picture sent]
BOLLU	Ok can I have location
UC1	which girl u want??
BOLLU	Izzy
UC1	n what service
BOLLU	Which will you provide
UC1	hr its \$300 n hh is \$150.. xtras r more \$\$
BOLLU	Hh
UC1	do u want bare or u wanna bring condoms? bare is \$50 more.. izzy doesnt do anal bc shes still little
BOLLU	I don't have condom

<sup>3</sup> Photographs sent did not depict actual minors.

BOLLU	No bare
BOLLU	Can I have location
UC1	can u get condoms since u dont want bare.. it would be \$150 for half hour
BOLLU	Ok
BOLLU	Location
UC1	what time u wanna come?
BOLLU	Iam thinking
BOLLU	I want to come now
BOLLU	There
BOLLU	Hlo
UC1	were in manchester hun how far are you?
BOLLU	Lowell
UC1	i dont know where that is lol but were at [hotel name redacted] hun
UC1	dont forget condoms bc my izzy is 12 years old and i cant have her catching something
BOLLU	Ok
BOLLU	Location
UC1	let me know when youre getting close. the \$150 is for half hour full sex no anal shes too little

10. UC1 then provided BOLLU the address of a hotel in Manchester, NH (“Hotel”) as the location of the date with the 12-year-old girl. BOLLU then indicated that he would plan to come the following evening, November 15, 2024, to have sex with the 12-year-old girl.

11. On November 15, 2014, BOLLU re-initiated the conversation with UC1. BOLLU through text messages with UC1 and phone calls with other undercover agents agreed to pay \$100 to have sex with the 12-year-old girl:

BOLLU	Hi
BOLLU	Gm
BOLLU	There
UC1	hey hun.. just getting goin today how r u?
BOLLU	Good
BOLLU	How are you
UC1	good hun u ready to party?
BOLLU	Yes
BOLLU	Can I have a pic of izzy please
BOLLU	There
UC1	no more pics! I told u ! we dont mk \$\$ sending pics

BOLLU	Just one pic
BOLLU	Just one
UC1	Nope
BOLLU	I will not ask again
BOLLU	I just need one
BOLLU	Pic
UC1	dude ur kinda sketch u told me u were comin n i sent u the address n then u didnt come.. i feel like ur just trying to get free pics
UC1	if this isnt ur thing its cool i told u my girls are specialty n are not for everyone
BOLLU	Ok sorry
BOLLU	I will be there at 8.00 pm today
BOLLU	Same location right
UC1	no need to apologize just lmk if ur coming so i can have her ready. hmu when ur ready and i will let you know 😊
UC1	shell be ready and excited to see you 🥰
BOLLU	Ok same address right
UC1	hun for our safety i will let u know when ur ready .. hope u understand
BOLLU	Ok
UC1	just bring condom since u dont want bare ok
UC1	i forgot how much time u want.. did u want hour or just hh?
BOLLU	You don't have condom
BOLLU	First I want hh
UC1	okay itll be \$150 but no rough stuff bc shes young.. lmk if thats okay with u but the \$150 is for full service
BOLLU	Ok
UC1	most clients prefer their own condom n reason i am asking 😊
BOLLU	I really don't have condoms so can you provide
BOLLU	There
UC1	ill try hun i just dont know how many ill have left by the time u get here..
BOLLU	I just need one
BOLLU	And can I know how many time I can ejaculate a in 30 min
UC1	however multiple shots on goal u can do in ur time is all good
UC1	u pay for ur time hun
BOLLU	Ok
BOLLU	Can I know qv price
UC1	quick visit is \$100 hun
BOLLU	Ok
BOLLU	Can I call you once
BOLLU	[Phone call]
BOLLU	There
UC1	ya you can call hun
BOLLU	Just now I called
BOLLU	You are not lifting the call

UC1	oh sorry ill call you back
BOLLU	Can I call now
BOLLU	[phone call]
UC2	[phone call]
UC1	let me know ur on the way jut want to mk sure izzy is ready for ya.. shes very excited to see you 😊
BOLLU	Ok
BOLLU	Can I have a video verification it showing me your number if spam risk
BOLLU	Can I have video verification
BOLLU	Please
UC1	dude its not like my number is going to come back to my name?!? like seriously! i dont do video i told u already
BOLLU	But it showing me your number is spam risk
BOLLU	Can you please just 5 sec
BOLLU	Video verification
UC1	dude STOP asking for video!!! NO VIDEO!!! If u dont want to come its fine!! But no video!!!! I already talked to you on the phone.
BOLLU	It least 5 sec video
BOLLU	Please
BOLLU	Or can I have a video than
BOLLU	Just for 5 sec
UC1	Dude i already told u NO!!!! stop asking! its not going to happen i dont do that. okay!
BOLLU	Can I have atleast a pic that showing hand
BOLLU	Please
UC1	a pic with what?? a hand??
UC1	of which girl??
UC1	and this would be the last thing im sending!!!! if u dont want to come dont but stop asking for video or verification!! I dont operate like that
BOLLU	Izzy pic
BOLLU	Just one pic
UC1	Last Photo!!! Izzy saying hi! [picture sent]
BOLLU	I think it's a photo shop
BOLLU	Same pic edited
UC1	okay dude nothing is photo shopped okay! im about to block you! these are real pics im sending if u dont like them thats on you!!!
BOLLU	[photo sent]
BOLLU	But they seem to be same
BOLLU	Ok iam gonna come
UC1	well dude you wanted specific pics and im sending wat u asked for.. i dont even know how to change pics
UC1	and if u dont want to come its cool too!!! u decide
BOLLU	Ok can I have another pic just different one
BOLLU	I really want to come but

BOLLU	I just want to verify
UC1	NOPE!!! No more photos! Ive already sent more than I usually do. I spoke to you on the phone. Im scared too. Im scared all the time. I have lots to lose. just stop texting me if ur not coming. I have lots of guys messaging. Just please stop asking for verification. Just stop!
BOLLU	I really want to come
BOLLU	I just need one pic
UC1	stop texting me unless ur coming. im not sending anymore pics. NO MORE!!!!!!
BOLLU	Ok
BOLLU	[phone call]
BOLLU	Hi there
BOLLU	[phone call]
UC2	[phone call]
BOLLU	[phone call]
BOLLU	[phone call]
BOLLU	Hey I am 5 mins away
BOLLU	Just want to let you know

12. BOLLU also communicated with UC1 through the phone number posted with the second identical advertisement on November 15, 2024, during the same period of time that he was communicating with UC1 through the number associated with the first identical advertisement:

BOLLU	Hi
BOLLU	Hi
BOLLU	There
UC1	HI
BOLLU	Available
UC1	I got couple girls available. I negotiate deal. No extras. No pics or video. U come have fun pay and leave quietly
BOLLU	Ok
BOLLU	Can I know the price
UC1	I got 12 yo Izzy and 14 yo Laila. Prices depend on how many u want and what u want
BOLLU	12 yo?
UC1	thats their ages. not their sizes
BOLLU	What 12 yo
UC1	yes. 12 years old but she has experince with men
BOLLU	Can I have video verification
BOLLU	Just for 5 sec



UC1	NO FUCKING WAY> JUST TOLD U THAT. U ASK AGAIN I DONE TALKING
BOLLU	Ok
BOLLU	Can I atleast have a pic
UC1	U HAVE PICS. We talked earlier. I aint fucking around with u any more.
BOLLU	Can I know price
UC1	QV is \$75. Half hour is \$150. Hour is \$300. You must have condom or pay extra \$50.
UC1	you want 14 year old girl or 12 year old girl.
BOLLU	Location
BOLLU	14
BOLLU	Did you have more than 18 years girl
UC1	NO I have those 2 girls. If you dont like younger. GO pick another ad
UC1	Do you want butt stuff. Do you have condoms.
UC1	how ong do you want to screw her for?
BOLLU	I don't have condom
BOLLU	Hh
UC1	Half hour. No condom is \$225. Liala the 14 year old. Full sex. Deal or not?
BOLLU	Will you provide condom
BOLLU	I need condom
BOLLU	First I will try qv
UC1	I will if you send me picture of your cash right now to show u are for real!
BOLLU	Iam gonna come
BOLLU	At 8.00pm
BOLLU	Just I need the address
UC1	if u schedule 15 minutes thats all you get cuz i schedule appointments.
BOLLU	Ok I will be there at 8.00
UC1	You will get address when you message me back at 8pm and show me you got the money in cash
BOLLU	Can I know the address
UC1	not giving it to you now.
UC1	We are in Manchester New Hampshire. Message me at 8pm. I will have Laila ready for 30 minutes. Send pic of cash and i give you condom. we talk, you fuck, you pay and you leave
UC1	no videos, no pictures, so dont ask
UC1	if you get out of work earlier. Message me then.
UC2	[Phone call]
BOLLU	[Phone call]

13. As noted in the charts above, BOLLU also had phone calls with the Advertisement Numbers several times on November 15, 2024, and spoke to another undercover agent (“UC2”), who was posing as the person who posted the Advertisements and the user of the Advertisement Numbers. During one call, BOLLU asked to speak with the 12-year-old girl. In a subsequent call, another undercover agent (“UC3”) spoke with BOLLU and UC2. UC3 used a high-pitched voice and posed as the 12-year-old girl. On this call, BOLLU indicated that he planned to “have fun” with the 12-year-old girl and that he wanted her to wear black panties when they met.

14. Shortly thereafter, BOLLU called one of the Advertisement Numbers and indicated that he wanted to bring a “friend” to the planned encounter and that the friend also wanted to have sex with the 12-year-old girl after BOLLU. In a subsequent call with the -0801 number, UC2 spoke to BOLLU and confirmed that the friend also wanted to pay to have sex with the 12-year-old girl, one after the other. On that call, UC2 asked to speak to BOLLU’s friend and BOLLU was then joined on the call by his friend, now believed to be KOTESHWARA JONNAGODDA. JONNAGODDA spoke to UC2 and indicated that he wanted to have sex with the 12-year-old girl, that he understood that the purported girl was 12-years old, and that he was not into “rough stuff.” JONNAGODDA also agreed to pay \$100 to have sex with the 12-year-old girl for 15 minutes. He confirmed that he wanted to have sex with the same 12-year-old girl as BOLLU, after BOLLU’s time was finished. JONNAGODDA also confirmed that he and BOLLU would bring condoms. UC2 asked JONNAGODDA and BOLLU to wait at a nearby pharmacy.

15. BOLLU resumed text messaging with the Advertisement Numbers, indicating that he and JONNAGODDA had gone to a nearby pharmacy before arriving at the hotel.

16. When BOLLU called one of the Advertisement Numbers and indicated that he and JONNAGODDA had arrived at the Hotel , UC2 asked BOLLU to drive from the front to the back

of the hotel to meet UC2. Moments later, a Black SUV pulled into the back area of the Hotel parking lot. After UC2 approached the vehicle, BOLLU rolled down his window and had a conversation with UC2. BOLLU and JONNAGODDA were together in the car. BOLLU was the driver and JONNAGODDA was seated in the passenger seat. During the conversation, both BOLLU and JONNAGODDA stepped out of the vehicle and continued to speak with UC2 in the parking lot beside the vehicle. UC2 confirmed with both BOLLU and JONNAGODDA that they each wanted to have sex with the 12-year-old girl one at a time. UC2 asked both BOLLU and JONNAGODDA to show her the cash for the agreed transaction and both of them confirmed that they had the agreed amount.

17. Law enforcement then arrested BOLLU and JONNAGODDA and took them into custody in the parking lot. BOLLU's black iPhone was seized from his person. A gray iPhone was seized from JONNAGODDA's person. During a search of the car, law enforcement officers located a white iPhone in the center console. Officers seized all three phones.

18. Officers then placed a call to the -0801 number that had been used to communicate with UC1 and observed the black iPhone ringing.

19. During a search of BOLLU's person at the time of his arrest, officers located the black iPhone, one condom, car keys, one \$100 bill, two \$20 bills, and one \$10 bill.

20. During a search of JONNAGODDA's person at the time of his arrest, officers located the gray iPhone, two bank cards, two condoms, a \$100 bill, and five \$1 bills.

21. During a search of the vehicle, in addition to the white iPhone, Officers located a box of condoms, several condoms outside of the box, a wallet, and a driver's license belonging to BOLLU.

22. Officers subsequently reviewed security video footage of BOLLU and JONNAGODDA inside a nearby Rite Aid pharmacy shortly before they arrived at the hotel. In the video, JONNAGODDA is seen purchasing a box of condoms. Officers also obtained a receipt from the Rite Aid pharmacy which matches this purchase.

23. Officers also obtained information that the car was a rental car that had been rented in BOLLU's name.

**CONCLUSION**

24. Based on the foregoing, I respectfully submit that there is probable cause to support a criminal complaint charging BOLLU and JONNAGODDA with attempted sex trafficking of a minor, in violation of Title 18, United States Code, Sections 1591(a)(1), b(1) and 1594 and aiding and abetting in violation of 18 U.S.C. § 2.

/s/ Lori Robinson  
Lori Robinson, Special Agent  
Homeland Security Investigations

Attested to by the applicant in accordance  
with the requirements of Fed. R. Crim. P. 4.1 by  
telephone, on this 17<sup>th</sup> day of November, 2024.

 

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HONORABLE ANDREA K. JOHNSTONE  
UNITED STATES MAGISTRATE JUDGE